

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

**LINDA M. LESLIE, Regional Director of
the Third Region of the National Labor
Relations Board, for and on behalf of the
NATIONAL LABOR RELATIONS BOARD**

No. 1:22-cv-00478-JLS

Petitioner,

vs.

STARBUCKS CORPORATION,

Respondent.

RESPONDENT STARBUCKS CORPORATION'S STATUS REPORT

Pursuant to the Court's November 15, 2022, order (Doc. 66), Respondent Starbucks Corporation submits this status report. Respondent is aware that Workers United ("Union") claims its Second Circuit submission is forthcoming during the week of November 28, 2022. (Doc. 67). In the meantime, the Union, the Union's agents, and the current and former employees of Respondent who were served with subpoenas (collectively, "Subpoenaed Nonparties") continue to violate the Court's September 23, 2022, order, as they have not produced a single document, nor any privilege log. (Doc. 49). The Subpoenaed Nonparties also have not filed a motion for a protective order, as the Court previously advised them to do. For the reasons set forth in Respondent's motion for contempt and imposition of sanctions, and in its reply, the Subpoenaed Nonparties are, and remain, in contempt. (Docs. 59, 63).

Dated: November 22, 2022

Respectfully submitted,

/s/ David Kadela

David Kadela (*Pro Hac Vice*)
Jeffrey S. Hiller (*Pro Hac Vice*)
LITTLER MENDELSON, P.C.
41 South High Street, Suite 3250
Columbus, OH 43215
Tel: 614-463-4201
Fax: 614-573-7475
Email: dkadela@littler.com
jhiller@littler.com

Jacqueline Phipps Polito
LITTLER MENDELSON, P.C.
375 Woodcliff Drive, Suite 2D
Fairport, NY 14450
Tel: 585-203-3413
Fax: 585-486-1774
Email: jpolito@littler.com

Jonathan Levine (*Pro Hac Vice*)
Adam-Paul Tuzzo (*Pro Hac Vice*)
LITTLER MENDELSON, P.C.
111 East Kilbourn Ave., Suite 1000
Milwaukee, WI 53202
Tel: 414-291-5536
Fax: 414-291-5526
Email: jlevine@littler.com
atuzzo@littler.com

Brittany L. Stepp (*Pro Hac Vice*)
LITTLER MENDELSON, P.C.
1601 Cherry Street, Suite 1400
Philadelphia, PA 19102
Tel: 267-402-3124
Fax: 267-402-3131
Email: bstepp@littler.com

*Attorneys for Respondent
Starbucks Corporation*